

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

STANLEY LIGAS, et al.,)	
)	
Plaintiffs,)	No. 05 C 4331
)	
vs.)	Chief Judge Holderman
)	
JULIE HAMOS, et al.,)	
)	
Defendants.)	

AGREED MOTION FOR THE ENTRY OF JUDGMENT ORDER

Pursuant to the Consent Decree (the “Decree”) approved by this Court on June 15, 2011 (Doc. Nos. 547, 549), Plaintiffs and Defendants respectfully move this Court to enter a Judgment Order for the payment of reasonable costs and expenses incurred by Class Counsel; as well as attorneys’ fees incurred by both Class Counsel and Intervenor Counsel, all in accordance with the express terms of the Decree. (A Proposed Order is attached as Exhibit A.)

The Decree provides that in full settlement of all out-of-pocket costs and expenses (not including attorneys’ fees) incurred by Class Counsel through approval of the Decree, Defendants shall reimburse Class Counsel their reasonable costs and expenses and that that amount shall be set forth in a Judgment Order to be entered by the Court, with one-half of that amount due in State Fiscal Year 2012 (which begins July 1, 2011) and one-half of that amount due in State Fiscal Year 2013 (which begins July 1, 2012). (Decree ¶38.) The Decree further provides that in full settlement of attorneys’ fees incurred both by Class Counsel and Intervenor Counsel, Defendants shall pay \$1,740,000.00 to Class Counsel and \$500,000.00 to Intervenor Counsel with one-half of those amounts due in State Fiscal Year 2012 (which begins July 1, 2011) and one-half of those amounts due in State Fiscal Year 2013 (which begins July 1, 2012). (*Id.*)

Pursuant to the Decree, Class Counsel has provided Defendants with information regarding their out-of-pocket costs and expenses and Defendants have agreed to payment in the total amount of \$463,920.63.

WHEREFORE, Plaintiffs and Defendants respectfully request that this Court enter the attached Judgment Order providing for payment in the total amount of \$463,920.63 to Class Counsel (as more fully set forth in the attached Proposed Order, Exhibit A), reflecting the agreed amount of reasonable costs and expenses incurred by Class Counsel that are reimbursable under Decree; as well as for the payment of \$1,740,000.00 in attorneys' fees to Class Counsel, and the payment of \$500,000.00 in attorneys' fees to Intervenor's Counsel.

Dated: June 29, 2011

Respectfully submitted,

For Plaintiffs	For Defendants
By: <u>/s/ Wendy N. Enerson</u> John Grossbart Wendy N. Enerson Corey M. Shapiro SNR Denton US LLP 233 S. Wacker Dr., Suite 7800 Chicago, Illinois 60606 Barry C. Taylor Laura J. Miller Kendra K. Hartman Equip for Equality 20 North Michigan Avenue, Suite 300 Chicago, Illinois 60602 Benjamin S. Wolf Roger Baldwin Foundation of ACLU, Inc. 180 North Michigan Avenue, Suite 2300 Chicago, Illinois 60601 Patricia A. Werner Access Living of Metropolitan Chicago	By: <u>(with consent of) Brent D. Stratton</u> Brent D. Stratton Thomas A. Ioppolo Kathleen Kreisel Flahaven Office of the Illinois Attorney General 100 W. Randolph Street, 12 th Floor Chicago, Illinois 60601 Karen Konieczny John E. Huston Christopher S. Gange Office of the Illinois Attorney General 160 North LaSalle Street, Suite N-1000 Chicago, Illinois 60601

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CERTIFICATE OF SERVICE

The undersigned, an attorney for the Plaintiffs, certifies that on June 29, 2011, she electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the counsel of record.

/s/ Wendy N. Enerson